

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

WAYNE B. LYNCH, Administrator)	
of the Estate of DONOVON W. LYNCH,)	
Deceased,)	
)	Case No. 2:21-cv-341
Plaintiff,)	
)	
v.)	
)	
SOLOMON D. SIMMONS, III, et al.,)	
)	
Defendants.)	

MOTION TO WITHDRAW

Joseph V. Sherman, P.C., as counsel of record for Wayne B. Lynch, Administrator for the Estate of Donovan W. Lynch, by counsel, moves to withdraw as counsel of record.

1. Before Mr. Lynch engaged Joseph V. Sherman, P.C., to represent the Estate, counsel advised of a potential conflict of interest in litigating against Anchor Legal Group due to an existing relationship between the law firms and a personal relationship between the principals. Mr. Lynch waived this conflict and retained counsel. Engagement letter attached as Exhibit A.

2. Mr. Lynch advises that he now wishes to withdraw, or not renew, his waiver of any conflict of interest based on learning new information about the ongoing and existing relationship between Joseph V. Sherman, P.C., and Anchor Legal Group and its principals.

3. Joseph V. Sherman, P.C. advised Mr. Lynch that, with deadlines in place, counsel could not withdraw without a substitute counsel prepared to take over and would need to continue working on deadlines imposed by the Court's Order of June 5, 2023. Dkt. 109.

4. Mr. Lynch advised he seeks new counsel and desires the filing of this motion to seek additional time to respond to litigation deadlines to avoid prejudice to the Estate's interests.

5. Joseph V. Sherman, P.C., files this motion at Mr. Lynch's request to advise the Court of Mr. Lynch's desire to substitute counsel and extend litigation deadlines.

6. As Joseph V. Sherman, P.C. remains counsel of record until and unless the Court grants this Motion and the Court's Order specifies Joseph V. Sherman, P.C. is to draft and file certain documents, counsel will continue work on these filings unless the Court orders otherwise.

7. Joseph V. Sherman, P.C. will advise this Court by filing a Motion to Substitute counsel if Mr. Lynch hires new counsel willing to substitute and fulfill the litigation obligations.

Joseph V. Sherman, P.C., as counsel of record to Wayne Lynch, as the Administrator of the Estate of Donovan W. Lynch, by counsel, moves this Court to withdraw as counsel of record.

June 15, 2023

**WAYNE B. LYNCH, ADMINISTRATOR OF
THE ESTATE OF DONOVON W. LYNCH,
DECEASED**

By: /s/ Joseph V. Sherman
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CERTIFICATE OF SERVICE

I certify that on June 15, 2023, I electronically filed a true copy of the foregoing MOTION TO WITHDRAW with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record including:

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/s/ Joseph V. Sherman
Joseph V. Sherman (VSB No. 86099)